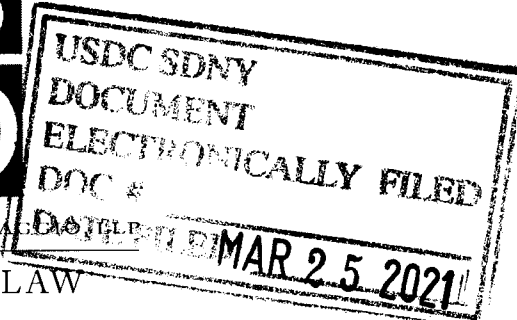


FASULO BRAVERMAN & DI MAGGIO

ATTORNEYS AT LAW

Louis V. Fasulo, Esq. – NY & NJ
Samuel M. Braverman, Esq. – NY & NJ
Charles Di Maggio, Esq. – NY & MA

www.FBDMLaw.com
SBraverlaw@fbdmLaw.com



March 24, 2021

Hon. George B. Daniels
United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Ramon De La Puerta Rodriguez*
Dkt.: 18 Cr 0782-04 (GBD)

SO ORDERED:

George B. Daniels
George B. Daniels, U.S.D.J.

Dated: MAR 25 2021

Dear Judge Daniels:

I represent Ramon De La Puerta Rodriguez, a defendant in the above matter. Mr. De La Puerta is at liberty on a bond, the conditions agreed to by the parties at his arraignment in this district and approved by the magistrate judge as follows:

1. A \$350,000 personal recognizance bond, cosigned by one financially responsible person, and secured by \$17,500 in cash;
2. His travel is restricted to the Southern and Eastern Districts of New York and the Southern District of California;
3. He is to surrender all travel documents and to make no new applications;
4. He is directed to be supervised by Pre-trial services in the Southern District of California, including electronic monitoring, drug testing, and home detention; and
5. He is directed to continue work or to seek work. His home detention is subject to Pre-trial Services allowing him out of the house for work purposes.
6. He is not allowed to travel to Mexico.

Mr. De La Puerta was arrested in San Diego, California on September 16, 2021 and the above bond conditions were set by the magistrate in San Diego. Mr. De La Puerta posted the above bond requirements and was released pending his first court appearance in New York (on October 16, 2021). His bond conditions in this District were continued from his conditions in California. He has been in compliance with all the terms of his bond now for more than six

225 Broadway, Suite 715
New York, New York 10007
Tel (212) 566-6213
Fax (212) 566-8165

505 Eighth Avenue, Suite 300
New York, New York 10018
Tel (212) 967-0352
Fax (201) 596-2724

1086 Teaneck Road, Suite 3A
Teaneck, New Jersey 07666
Tel (201) 569-1595
Fax (201) 596-2724

months.

Mr. De La Puerta is a doctor who owns several clinics in California and Mexico. Pre-trial Services in SDCA allows him out of the house, pursuant to a Pre-trial Services approved schedule, starting at 6am and ending at 9:30pm to return home at the end of the workday. Mr. De La Puerta submits his proposed weekly schedule to Pre-trial Services for approval, and he may make requests for adjustments with 72 hours' notice to Pre-trial Services. He wears a GPS-monitoring ankle bracelet, so his whereabouts are known every minute of every day.

Mr. De La Puerta seeks to expand his work area and now asks this Court for two modifications to his bond:

1. To expand his area of travel to the Central District of California (which includes Los Angeles and surrounding cities) upon the approval of his Pre-trial Services officer (not to be unreasonably withheld). For example, he has a business meeting that would enhance his business that he would like to attend in Los Angeles for this coming Saturday, March 27, 2021.
2. Further, as meetings to expand his business are often scheduled after the workday, he would like to be able to attend these until 11pm instead of the current 9:30pm. There was no curfew set in the original bond by in this District.

I have spoken with AUSA Kyle Wirshba, and the Government consents to expanding the defendant's area for work purposes to include the Central District of California for specific work trips and with the advance approval of Pre-trial services, including this planned work meeting on March 27, 2021. The Government believes that any matter related to curfew should be the province of Pre-trial Services.

I have corresponded with SDCA Pre-trial Services Officer Aldo Lopez, who consulted with Pre-trial services in this District, and he has no objection to this request.

Mr. De La Puerta has a successful business (not the subject of this indictment), employing many people and paying taxes. He seeks the Court's permission to continue to work on his business and take advantage of opportunities to improve and expand that business. I thank the Court for its consideration.

Respectfully submitted,

s/ Sam Braverman

Samuel M. Braverman, Esq.
Fasulo Braverman & Di Maggio, LLP
225 Broadway, Suite 715
New York, New York 10007
Tel. 212-566-6213

225 Broadway, Suite 715
New York, New York 10007
Tel (212) 566-6213
Fax (212) 566-8165

505 Eighth Avenue, Suite 300
New York, New York 10018
Tel (212) 967-0352
Fax (201) 596-2724

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Fax (201) 596-2724